

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GLORIA VALDEZ,

Plaintiff,

v.

METHODIST HOSPITALS OF DALLAS,

Defendant.

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CIVIL ACTION NO.

3:23-cv-02327-B

PLAINTIFF’S MOTION IN LIMINE

**I.
INTRODUCTION**

Pursuant to the Court’s Scheduling Order (Doc. 6) and the Federal Rules of Civil Procedure, Gloria Valdez (“Plaintiff”) submits this Motion in Limine, requesting that Methodist Hospitals of Dallas (“Defendant”) be precluded from mentioning any of the following items without first obtaining a ruling from the Court that such items are relevant and admissible.

**II.
BASIS FOR THE MOTION**

Plaintiff seeks to prevent Defendant, its counsel, and its witnesses from mentioning, referring to, alluding to, intimating and/or introducing evidence of or testimony concerning:

1. Any mention that Plaintiff sought, received, or was denied unemployment benefits by the Texas Workforce Commission following the termination of her employment from Defendant.

2. If any claims are dismissed on summary judgment, any mention or reference to claims that are no longer before the Court due to dismissal by the Court in its orders in this case or by action of the Plaintiff’s pleadings. Such evidence would be unduly prejudicial and any such evidence would not be relevant to the claims or defenses in this case.

3. Any mention or reference to any findings the EEOC's "Right to Sue" dismissal letter is overly prejudicial and any such findings or communications would intrude upon the purview of the jury to be the sole arbiter of the facts of this case. Such evidence would be unduly prejudicial and any such evidence would not be relevant to the claims or defenses in this case.

III.
CONCLUSION AND PRAYER

Plaintiff respectfully requests this Court grant this Motion, enter an Order prohibiting Defendant from admitting or attempting to admit into evidence the items discussed herein, without first obtaining approval from the Court outside the presence of the jury, and respectfully requests all legal or equitable relief this Court deems proper.

Respectfully submitted,

/s/ Brittney L. Thompson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that on October 29, 2024, the undersigned counsel conferred in person with Defendant's counsel regarding the relief requested in this Motion in Limine. Defendant does not oppose topics 1 and 3, but opposes topic 2.

/s/ Brittney L. Thompson

BRITTNEY L. THOMPSON

CERTIFICATE OF SERVICE

I certify that a copy of this document was forwarded to all counsel of record through the Court's ECF system as of the date file stamped thereon.

/s/ Brittney L. Thompson

BRITTNEY L. THOMPSON